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ATTORNEY FOR CREDITOR: CONSUMER PORTFOLIO SERVICES

**IN THE BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY (CAMDEN)
HONORABLE JERROLD N. POSLUSNY, JR.**

In re: : Case No. 17-28396-JNP
:
MATTHEW WINELAND, :
:
Debtor, :
:
: Chapter 13
:
: Hearing Date: February 13, 2018
:
_____ :

**NOTICE OF MOTION FOR RELIEF FROM STAY
FOR FAILURE TO MAKE PAYMENTS OUTSIDE OF PLAN**

To:

Matthew Wineland 334B Delancey Place Mount Laurel, NJ 08054	Brad J. Sadek Sadek and Cooper 1315 Walnut Street Ste 502 Philadelphia, PA 19107
Isabel C. Balboa Chapter 13 Standing Trustee Cherry Tree Corporate Center 535 Route 38 - Suite 580 Cherry Hill, NJ 08002	Office of the United States Trustee One Newark Center 1085 Raymond Boulevard Suite 2100 Newark, NJ 07102

PLEASE TAKE NOTICE that Consumer Portfolio Services, will make a motion on the 13th day of February, 2018 at 10:00 a.m. or as soon thereafter as counsel may be heard before the Honorable Jerrold N. Poslusny, Jr., sitting at the Mitchell H. Cohen U.S. Courthouse 400 Cooper Street, 4th Floor, Camden, N.J. 08101, for an order granting relief from the automatic

stay due to debtor's failure to make regular installment payments outside the Plan as more particularly set forth in the Certification submitted herewith. Costs and counsel fees will also be requested. The property involved is a 2009 BMW 3 Series Sedan 4D 335xi AWD 3.0L I6 Turbo VIN WBAPL33579A407171.

TAKE FURTHER NOTICE that if you contest this motion, you must appear in Court on the date noted above AND you are further required to file with the Court and serve on the undersigned a written response no later than seven (7) days prior to the hearing date set forth herein.

MESTER AND SCHWARTZ, P.C.

/s/ Jason Brett Schwartz
Jason Brett Schwartz, Esq.
Counsel for Movant